

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: OCT 29 1990

SUBJECT: Pagel's Pit Alternatives Array

FROM: Judy Kleiman, RCRA/CERCLA Liaison *Judy Kleiman*

TO: Bernard Schorle, RPM

The Alternatives Array for the Winnebago Reclamation Landfill (WRL) in Winnebago County, Illinois, also known as Pagel's Pit, has been reviewed by RCRA for ARARs. As discussed in my previous memo dated August 1, 1990, this site is complicated by the possibility that some of the contamination here may have originated at another CERCLA site where RCRA waste has been identified.

In the Remedial Investigation Report reviewed previously, there is no evidence that RCRA hazardous waste has been disposed of at WRL, but if the contamination at the WRL site is, at least in part, due to the listed waste disposed of at the Acme site, then remedial actions on the ground water may be subject to RCRA ARARs. Spent solvents and still bottoms from solvent recycling were disposed of at the nearby Acme site. These wastes are RCRA listed wastes F001-F005 and if they are present in the ground water at the Winnebago site, RCRA ARARs would apply to remediation of the ground water. Any residue from the treatment of this ground water would be listed waste and would have to be managed accordingly.

If it is assumed that none of the contamination at the WRL originates from the listed waste disposed of at the Acme site, then RCRA ARARs are only applicable if the residues from the treatment of the ground water are characteristic by the TCLP. Wastes which are characteristic only for a newly identified organic constituent have no treatment standards at this time but can be land disposed only in a subtitle C unit.

It is only the ground water at this site which could be contaminated with RCRA waste from the Acme site. There is no information indicating that any listed waste was disposed of in the Winnebago landfill, and consequently, the leachate from this landfill could not contain listed RCRA waste. According to the data in Table 2 of the Alternatives Array, the leachate from WRL is not hazardous by characteristic for either inorganic or organic constituents and would not be subject to RCRA ARARs.

Since there is no evidence that RCRA hazardous waste has been disposed of at WRL, a subtitle C cap would not be required, although a well designed cap is always recommended.

If you have any questions on this matter, please contact me at 886-1482.

cc: Karl Bremer